REMARKS

Claims 1-31 are pending in the instant application. Claims 1-31 are rejected. Applicant respectfully requests reconsideration of the Claims based on the arguments presented below.

Claim Objections

Claims 7, 15, 24 and 31 are objected to because of alleged informalities. Amendments to the Claims made herein obviate the cited objections. Accordingly, Applicants respectfully request the withdrawal of the claim objections.

101 Rejections

Claims 26-31 are rejected under 35 USC 101 as being drawn to non-statutory subject matter. In particular, to non-statutory descriptive material. However, as is admitted in the instant rejection, these claims have a means plus function form. Applicants respectfully submit that the means plus function form is generally understood by patent practitioners to be a statutory form of Claim, and thus the Examiner's characterization of these claims as being non-statutory is improper. According Applicants' respectfully request that the 35 USC 101 rejection of Claims 26-31 be withdrawn.

102/103 Rejections

Claims 1-31 are rejected under 35 U.S.C. § 102(b) as being anticipated by or in the alternative under 35 USC 103(a) as obvious over "Network Simulations with OPNET", X. Chang, Proceedings of 1999 Winter Simulation Conference, IEEE 1999 (hereinafter "Chang").

The Examiner is respectfully directed to independent Claim 1 which is drawn to a method for generating a simulated network. Claim 1 is reproduced below in it's entirety for the convenience of the Examiner.

> 1. A method for generating a simulated network, the method comprising:
> receiving a network topology generated at a graphical user interface by a user, wherein the network topology comprises a plurality of devices and at least one connection; and
> automatically generating a build file describing the simulated network based on the network topology wherein the automatically generating a build file comprises:
> > accessing characteristics for at least one device of the plurality of devices, the characteristics including static information for the device;
> > accessing a neighbor discovery protocol table for the device, the neighbor discovery protocol table including connection information for the device; and
> > compiling the static information and connection information into the build file.

Claims 9, 17 and 26 contain limitations similar to those contained in Claim 1. Claims 2-8 depend from Claim 1 and recite further limitations of the present invention. Claims 10-16 depend from Claim 9 and recite further limitations of the present invention. Claims 18-25 depend from Claim 17 and recite further limitations of the present invention. Claims 27-31 depend from Claim 26 and recite further limitations of the present invention.

Chang does not anticipate or render obvious the embodiments of Applicant's invention as are set forth in the Claims. A deficiency of Chang that Chang does not teach or suggest each of the limitations of the Claims. In particular, Chang does not teach or suggest a method for generating a simulated network that includes a process for automatically generating a build file that includes "accessing characteristics for at least one device of the plurality of devices, the characteristics including static information for the device; accessing a neighbor discovery protocol table for the device, the neighbor discovery protocol table including connection information for the device; and compiling

the static information and connection information into the build file" as is set forth in Claim 1 (Claims 9, 17 and 26 contain similar limitations).

Chang discloses a network simulations software package (e.g., OPNET). Chang discloses software that can be used to compare software simulation packages. However, Chang does not disclose the specifically recited operations that are a part of the recited generating a build file that is set forth in Claim 1.

In fact, Applicants respectfully submit that nowhere in the Chang reference is a method for generating a simulated network that includes generating a build file which includes the operations: (1) accessing characteristics for at least one device of the plurality of devices, the characteristics including static information for the device; (2) accessing a neighbor discovery protocol table for the device, the neighbor discovery protocol table including connection information for the device; and (3) compiling the static information and connection information into the build file.

Because of the deficiencies that are outlined above, Applicants respectfully submit that Chang does not anticipate or render obvious the embodiments of the present claimed invention as set forth in Claims 1, 9, 17 and 26, and as such, Claims 1, 9, 17 and 26 are in condition for allowance. Accordingly, Applicant also respectfully submits that Chang does not anticipate or render obvious the embodiments of the present claimed invention as set forth in Claims 2-8, 10-16, 18-25 and 27-31 dependent on Claims 1, 9, 17 and 26, and that Claims 2-8, 10-16, 18-25 and 27-31 overcome the Examiner's basis for rejection under 35 U.S.C. 102(e) as being dependent on allowable base claims.

Claims 1-31 are rejected under 35 U.S.C. § 102(b) as being anticipated by or in

the alternative under 35 USC 103(a) as obvious over "OPNET Modeler", Product

Description, OPNET Technologies Inc., March 2001 (hereinafter "OPNET").

The Examiner is respectfully directed to independent Claim 1 which is drawn to a

method for generating a simulated network. Claim 1 is reproduced below in it's entirety

for the convenience of the Examiner.

        1. A method for generating a simulated network, the method
comprising:
        receiving a network topology generated at a graphical user
interface by a user, wherein the network topology comprises a
plurality of devices and at least one connection; and
        automatically generating a build file describing the simulated
network based on the network topology <u>wherein the automatically
generating a build file comprises:</u>
            <u>accessing characteristics for at least one device of the
plurality of devices, the characteristics including static
information for the device;</u>
            <u>accessing a neighbor discovery protocol table for the
device, the neighbor discovery protocol table including
connection information for the device; and</u>
            <u>compiling the static information and connection information
into the build file.</u>

Claims 9, 17 and 26 contain limitations similar to those contained in Claim 1. Claims 2-8

depend from Claim 1 and recite further limitations of the present invention. Claims 10-16

depend from Claim 9 and recite further limitations of the present invention. Claims 18-25

depend from Claim 17 and recite further limitations of the present invention. Claims 27-

31 depend from Claim 26 and recite further limitations of the present invention.

OPNET does not anticipate or render obvious the embodiments of Applicant's

invention as are set forth in the Claims. A deficiency of OPNET is that OPNET does not

teach or suggest each of the limitations of the Claims. In particular, OPNET does not

teach or suggest a method for generating a simulated network that includes a process for

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generating build files that includes "accessing characteristics for at least one device of the plurality of devices, the characteristics including static information for the device; accessing a neighbor discovery protocol table for the device, the neighbor discovery protocol table including connection information for the device; and compiling the static information and connection information into the build file" as set forth in Claim 1 (Claims 9, 17 and 26 contain similar limitations).

OPNET shows a dissimilar network technology development system. OPNET discloses software that can be used to model and develop networks. However, OPNET does not disclose the specifically recited operations that are a part of the recited generating a build file that is set forth in Claim 1.

In fact, Applicants respectfully submit that nowhere in the OPNET reference is a method for generating a simulated network that includes generating a build file which includes the operations: (1) accessing characteristics for at least one device of the plurality of devices, the characteristics including static information for the device; (2) accessing a neighbor discovery protocol table for the device, the neighbor discovery protocol table including connection information for the device; and (3) compiling the static information and connection information into the build file.

Because of the deficiencies that are outlined above, Applicants respectfully submit that OPNET does not anticipate or render obvious the embodiments of the present claimed invention as set forth in Claims 1, 9, 17 and 26, and as such, Claims 1, 9, 17 and 26 are in condition for allowance. Accordingly, Applicant also respectfully submits that Huang does not anticipate or render obvious the embodiments of the present claimed invention as set forth in Claims 2-8, 10-16, 18-25 and 27-31 dependent on Claims 1, 9, 17

and 26, and that Claims 2-8, 10-16, 18-25 and 27-31 overcome the Examiner's basis for

rejection under 35 U.S.C. 102(e) as being dependent on allowable base claims.

Claims 1-31 are rejected under 35 U.S.C. § 102(b) as being anticipated by Huang

et al. (U.S. Patent No. 6,714,217). Applicants have reviewed the cited reference and

respectfully submit that the embodiments of the claimed invention that are set forth in

Claims 1-31 are neither anticipated nor rendered obvious by Huang.

The Examiner is respectfully directed to independent Claim 1 which is drawn to a

method for generating a simulated network. Claim 1 is reproduced below in it's entirety

for the convenience of the Examiner.

> 1. A method for generating a simulated network, the method
> comprising:
> receiving a network topology generated at a graphical user
> interface by a user, wherein the network topology comprises a
> plurality of devices and at least one connection; and
> automatically generating a build file describing the simulated
> network based on the network topology wherein the automatically
> generating a build file comprises:
> accessing characteristics for at least one device of the
> plurality of devices, the characteristics including static
> information for the device;
> accessing a neighbor discovery protocol table for the
> device, the neighbor discovery protocol table including
> connection information for the device; and
> compiling the static information and connection information
> into the build file.

Claims 9, 17 and 26 contain limitations similar to those contained in Claim 1. Claims 2-8

depend from Claim 1 and recite further limitations of the present invention. Claims 10-16

depend from Claim 9 and recite further limitations of the present invention. Claims 18-25

depend from Claim 17 and recite further limitations of the present invention. Claims 27-

31 depend from Claim 26 and recite further limitations of the present invention.

Huang does not anticipate or render obvious the embodiments of Applicant's invention as are set forth in the Claims. A deficiency of Huang that Huang does not teach or suggest each of the limitations of the Claims. In particular, Huang does not teach or suggest a method for generating a simulated network that includes a process for generating build files that includes "accessing characteristics for at least one device of the plurality of devices, the characteristics including static information for the device; accessing a neighbor discovery protocol table for the device, the neighbor discovery protocol table including connection information for the device; and compiling the static information and connection information into the build file" as is set forth in Claim 1 (Claims 9, 17 and 26 contain similar limitations).

Huang discloses a dissimilar system and method for providing a graphical user interface for building and monitoring a telecommunication network. Huang system is contended to provide a graphical interface for network development, management and monitoring. However, Huang does not disclose the specifically recited operations that are a part of the recited generating a build file that is set forth in Claim 1.

In fact, Applicants respectfully submit that nowhere in the Huang reference is a method for generating a simulated network that includes generating a build file which includes the operations: (1) accessing characteristics for at least one device of the plurality of devices, the characteristics including static information for the device; (2) accessing a neighbor discovery protocol table for the device, the neighbor discovery protocol table including connection information for the device; and (3) compiling the static information and connection information into the build file.

Conclusion

In light of the above-listed amendments and remarks, Applicants respectfully requests allowance of the remaining Claims.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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